

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (12)

JOHN RICHARD JAE, Plaintiff v. U.S. DISTRICT COURT
vs. No. 00cv0012

Plaintiff

VS.

KENNETH D. KYLER, et al.,

Defendants

FILED
HARRISBURG

U. S. DISTRICT COURT

Middle Judge Smy

JUN 27 2001

MARY E. DIANDBEA, CLERK

Per 93
DEPUTY CLERK

AFFIDAVIT OF INMATE NORMAN JOHNSTON

I, Norman Johnston, #44-, declare & affirm under
penalty of perjury & pursuant to 38 Pa. C.S. § 1746, that
the following facts are true & correct based upon my knowledge,
information and belief:

1. That, during the months of November, December
and January, 2000, I was confined in the RHU at SCI-Camp Hill.

2. That, Inmate John Richard Jae was suppose to be
in the RHU at SCI-CAMP HILL, in November & December, 2000
January, 2000.

3. That, In November & December, 1999, and in January,
Supintendent Kenneth D. Kyler, Deputy Superintendent for Facility
Management, and RHD Lieutenant Unit Manager William J.
at SCI-CAMP HILL did not allow RHU inmates to have
their own personal softcover law books and religious
other than a Bible or Quran in their RHU cells and that
John Richard Jae was not permitted to have a hard cover
softcover law books and religious books in the RHU
In November and December, 1999, and January, 2000,
John Richard Jae did not have the opportunity to obtain
religious books from his storage properly. He

P. 4. That, in April & May, 2000, I was confined in the RHU at SCI-Camp Hill and John Richard Doe, confirmed in the RHU at SCI-Camp Hill also stayed a few cells down from me.

S. That, in April & May, 2000, I ~~was~~ personally with officers Rubendall and Roger, the SCI-Camp Hill RHU Property Officers Jerry Robin Richard Doe, his legal and legal materials.

E. That, the RHU officers had developed an ongoing practice of denying RHU inmates showers & outside exercise, in November & December, 1999, & also had developed practices of placing plexiglass shield over RHU inmates cell doors when they talked to and back in November & December, 1999, and the Superintendent Kyle, Deputy Superintendent for Facility Management Palakovich and RHU Lieutenant/Unit Manager Rhoades were all aware of such and failed to do anything about such.

T. That, it was excessively hot in the RHU at SCI in November & December, 1999, and there was a problem with the heating system in the RHU in November & December, 1999.

(S)

MR. NORMAN J. THOMAS

ATTORNEY
ASSISTANT
ON

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